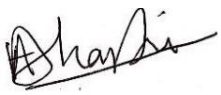
THE PEGASUS PARTNERSHIP TRUST

"Children First"

CHILD PROTECTION & SAFEGUARDING POLICY

Date this policy takes effect:	Review frequency:	Date to review:	Date to be ratified:
17.9.24	Annually	Designated Safeguarding Leaders Summer 2025	Board of Trustees Autumn 2025
How will Trustees be assured this has been implemented?		Ensure policy applied in the event of a Safeguarding or Child Protection of Allegation incident being made. Ensure protocol is followed. Keep updated with KCSIE.	
Signed:		Sash Hamidi (CEO)	
Signed:		Aliya Dhanji (CHAIR OF TRUSTEES)	

All policies are subject to change or review in light of Government guidance or when applied.

This policy works alongside the following policies: *Allegations Against Staff, Low-Level Concerns, Care & Control, Intimate Care, SCR, H&S, Recruitment and Selection, Medical, Risk Register, Staff Code of Conduct, Disciplinary, e-Safety, Anti-Bullying, Care & Control, Intimate Care Attendance, RHE, Mobile Phone use, Complaints, GDPR, Privacy, Whistleblowing*

The Pegasus Partnership Trust

THE PEGASUS PARTNERSHIP TRUST

"Children First"

Our Vision Statement

Within The Pegasus Partnership Trust, our vision and aims of education are underpinned by the UNICEF United Nations Conventions on the Rights of the Child (UNCRC). **Our Vision Statement**

We believe:

- All learning should be purposeful and experiential
- In learning values and skills for whatever the future brings
- We can be world changers

We are a PRIMARY MAT for PRIMARY SCHOOLS
so every child's PRIMARY EXPERIENCE enables lifelong learning

This means we are committed to providing an education, for all children, that should develop their personality, talents and abilities to the full (article 29). We encourage a sense of community spirit, where children pastoral care and well-being underpins academic, co-curricular and sporting excellence. We aim to achieve this through an inspiring curriculum, that is child-centred (article 3), and extends child learning beyond the constraints of the classroom. We want to instil a life-long love of learning and equip children with skills that develop their independence, critical thinking, self-awareness, resilience and self-confidence.

Statement of intent

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 (DPA2018), the United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

The Pegasus Partnership Trust aims to ensure that all personal data collected about staff, children, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the legislation mentioned above.

The Pegasus Partnership Trust, from time to time, may be required to share personal information about its staff or children with other organisations, mainly the LA, other schools and educational bodies, and potentially social services. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Safeguarding Statement

The Pegasus Partnership Trust respects and values all children and are committed to providing a caring, friendly and safe environment for all our children so they can learn, in a relaxed and secure atmosphere (article 31). We believe every child should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm (article 19). This is the responsibility of every adult employed by, or invited to deliver services to schools within the Trust. We recognise our responsibility to safeguard all who access school and promote the welfare of all our children by protecting them from physical, sexual and emotional abuse, neglect and bullying.

Equality Statement

At The Pegasus Partnership Trust, we ensure equality of education and opportunity for all children, staff, parents and carers receiving services from the school, irrespective of age, race, gender (re-assignment), disability (article 23), religion and belief (article 14), sexual orientation, marital/cohabiting status or socio-economic background (article 2). We develop a culture of inclusion and diversity in which all those connected to the school feel proud of their identity and able to participate fully in school life.

The achievement of children is monitored by race, gender and disability and we use this data to support children, raise standards and ensure inclusive teaching. We tackle discrimination by the positive promotion of equality, challenging bullying and stereotypes and creating an environment which champions respect for all. We believe that diversity is a strength, which should be respected and celebrated by all those who learn, teach and visit here.

This policy sets the expectation that all staff at The Pegasus Partnership Trust (the "Trust") see themselves as learners and therefore reflects their development as professionals.

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SAFEGUARDING

All staff have a statutory duty to keep every child safe

1. **Concerns about a *child*? CPOMS and DSL without delay**
2. **Concerns about an *adult*? Speak to the Academy Lead**
3. **Concerns about *Academy Lead*? Speak to CEO**
4. **Concerns about *CEO*? Speak to Chair of Trustees Aliya Dhanji**

THE PEGASUS PARTNERSHIP TRUST

"Children First"

Key Personnel for The Pegasus Partnership Trust

governance@theppt.co.uk

TPPT Chair of Trustees:	Aliya Dhanji governance@ThePPT.co.uk
TPPT CEO:	Sash Hamidi ceo@ThePPT.co.uk
TPPT Designated Safeguarding Trustee:	Paula Morgan governance@ThePPT.co.uk
Named person for Looked After Children:	Paula Morgan governance@ThePPT.co.uk
TPPT Head of HR:	Sash Hamidi HR@theppt.co.uk

Key Personnel for Priestmead Primary School

safeguarding@priestmead.theppt.co.uk

Designated Safeguarding Lead:	**Sachin Patel Spatel@priestmead.theppt.co.uk** **020 8907 5434** **07487600149**
Deputy Safeguarding Leads:	Amy Creamer Sash Hamidi Andrea Callender Aliya Boghani-Shah Angela Goonetilleke Alamin Miah Mark Alwyn **Telephone: 020 8907 5434**
Associate Headteacher:	Amy Creamer head@priestmead.theppt.co.uk
Safeguarding LSG Associate:	Dominic English governance@ThePPT.co.uk

Key Personnel for The Welldon Park Academy

safeguarding@welldonpark.theppt.co.uk

Designated Safeguarding Lead:	**Louise Bloomfield** **Telephone: 020 8864 9378/ 07950 855 385** **lbloomfield.310@welldonpark.theppt.co.uk**
Deputy Safeguarding Leads:	Rachel Bates Christalla Symeou Michelle Mensah Sanjana Bakshi Paul Maddock
Associate Headteacher:	Rachel Bates head@welldonpark.theppt.co.uk
Safeguarding LSG Associate:	Marilyn Borlase governance@ThePPT.co.uk

1.0 Aims

1.1 The Trust aims to ensure that:

- **Appropriate action is taken in a timely manner to safeguard and promote children's welfare**
- **All staff are aware of their statutory responsibilities with respect to safeguarding**
- **Staff are properly trained in recognising and reporting safeguarding issues**

2.0 Legislation and statutory guidance

2.1 This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education and Working Together to Safeguard Children (2023), and the guidance for those in governance: http://www.gov.uk/guidance/-governance-in-academy-trusts

We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

2.2 This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on Academies and local authorities to safeguard and promote the welfare of children
- The Academy Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains Academies' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

This policy also complies with our funding agreement and articles of association.

3.0 Definitions

3.1 Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

3.2 **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

3.3 **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

3.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

3.5 **Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude and semi-nude images, computer-generated imagery, videos or live streams.

3.6 **Children** includes everyone under the age of 18.

3.7 The following **THREE safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- **The local authority (LA)**
- **A clinical commissioning group (known as 'integrated care boards'/ICBs) for an area within the LA**
- **The chief officer of police for a police area in the LA area**

3.8 **Victim** is person who is affected by an act committed by an individual(s). It is important to recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

3.9 **Alleged Perpetrator(s)** Alleged perpetrator means an individual whom a victim alleges committed an act against the victim.

4.0 Equality statement

4.1 Some children have an increased risk of abuse both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

4.2 We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 9)
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence/abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 16)
- Are missing from education
- Children whose parent/carer has expressed an intention to educate them at home

5.0 Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Trustees and LSG Associates in each Academy within the Trust and all involved directly with the Trust. It is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended Academy and off-site activities. The schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares children and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, transphobia, biphobic and sexual violence/harassment.

5.1 All staff and those in governance

5.1.1 It is the responsibility of every member of staff to know and understand the Child Protection Policy and our safeguarding procedures. Failure to do this and not seeking clarification can lead to disciplinary action.

5.1.2 All staff and those in governance will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education , and review this guidance at least annually. All staff and those in governance will sign a declaration at the beginning of the academic year to say that they have reviewed the guidance or upon their appointment should they start in-year.

5.1.3 All staff and those in governance will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the Code of Conduct for All Adults Policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child on child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime (including that linked to county lines), Female Genital Mutilation (FGM) and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The importance of online safety when communicating with parents
- Providing a safe space for children who are LGBT to speak out and share their concerns
- Children are at risk of harm inside and outside their home, at school and online
- Children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection
- Online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring

5.1.4 Section 13 of this policy outlines in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

5.2.1 The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in their respective academy. During term time, the DSL will be available during academy hours for staff to discuss any safeguarding concerns. When the DSL is absent, the deputy DSLs will act as cover. During out-of-hours/out-of-term activities led by the academy there will always be a named Safeguarding Lead. The DSL will have a good understanding of harmful sexual behaviour (HSB). Ultimately the Academy Lead is always available and the LA has the Academy Lead's mobile number for emergencies.

5.2.2 The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

5.2.3 The DSL will also keep the Academy Lead informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

- The DSL will discuss the local response to sexual violence and sexual harassment with the police and local authority children's social care colleagues to prepare the school's policies.
- The DSL will be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- The DSL will be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- The DSL will be responsible for online safety, including filtering and monitoring processes

5.2.4 The full responsibilities of the DSL and deputies are set out in their job description.

5.3 Governance

5.3.1 The Pegasus Partnership Trust Board of Trustees alongside the Local Stakeholders Group for each Academy will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Academy Lead to account for its implementation
- Appoint a TPPT Trustee lead and a link LSG Associate to monitor the effectiveness of this policy in conjunction with the full LSG group and Board of Trustees. This is always a different person from the DSL
- Should ensure the designated safeguarding lead has the appropriate status and authority within the school or college to carry out the duties of the post.
- Should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures.
- Should be doing all that they reasonably can to limit children's exposure to online risks. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness
- Ensure procedures are in place are in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members and those in governance (including supply staff, volunteers, and contractors)
- Ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect online and offline in children with special educational needs or disabilities (SEND) or certain medical or physical health conditions
- Ensure service or activities provided by the Trust, under the direct supervision or management of their academy and staff apply the arrangements for child protection
- Where services or activities are provided separately by another body, The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.
- Make sure that the school has appropriate filtering and monitoring systems in place on school devices and school networks, and review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure that all staff and those in governance undergo safeguarding and child protection training, including online safety and that such training is updated at least annually and is in line with advice from the safeguarding partners
- Make sure staff and those in governance understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

The CEO with the Chair of the LSG will act as the 'case manager' in the event that an allegation of abuse is made against the Academy Lead, where appropriate (see appendix 5)

The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate (see appendix 5)

5.3.2 All Trustees and LSG Associates will read Keeping Children Safe in Education. Section 13 has information on how they are supported to fulfil their role (referred to as governors).

5.4 The Academy Lead

5.4.1 The Academy Lead is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction and that all staff (including temporary staff) understand and follow the procedures included in this policy, particularly those concerning referrals od cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the academy and via the academy website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of staff training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 5)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Making decision regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Making sure that online safety training is included in staff safeguarding and child protection training
- Oversee the safe use of technology, mobile phones and cameras in the setting

5.4.2 The CEO will hold the Academy Lead to account regarding their responsibilities.

5.5 Virtual School Heads

Virtual school heads manage child premium plus for looked after children; they receive this funding based on the latest published number of children looked after by the local authority. In maintained schools and academies, the designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children.

5.5.1 In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker (CWSW).

5.5.2 Virtual school heads should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children. This should include Designated Safeguarding Leads, Designated Teachers for Children Looked After, social workers, headteachers, governors, Special Educational Needs Co-ordinators, mental health leads, other local authority officers, including Designated Social Care Officers for SEND, where they exist.

6.0 Confidentiality

6.1 The Trust recognises that all matters relating to child protection are confidential.

6.2 The Academy Lead or the DSL will disclose any information about a child to other members of staff on a need-to-know basis only. All staff members have a professional responsibility to share information with other agencies in order to safeguard children. Generic awareness will be communicated to all staff through a Staff Voice meeting to ensure that small pieces of information are joined up regarding a child's wellbeing. This is cross-referenced by Safeguarding teams.

6.3 All staff members must be aware that they cannot promise a child or adult/colleague to keep secrets which might compromise a child's safety or well-being or their own which could affect their child/ children they work with.

6.4 All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare. All staff must share information in a timely manner to ensure effective safeguarding. The Data Protection Act (DPA) 2018 and GDPR expectations do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

6.5 If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

6.6 The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

6.7 Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 5.

6.8 The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it

6.9 As a matter of effective safeguarding practice, schools and colleges should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

7.0 Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and and those in governance **must follow the procedures set out below** in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

7.1 If a child is suffering or likely to suffer from harm, or in immediate danger

7.1.1 Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

7.1.2 Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. The procedure for making a referral can be found in figure 1 & appendix 3.

7.1.3 All records need to be given to the DSL within 30 minutes. No copies should be retained by the member of staff or volunteer.

7.1.4 The DSL will maintain case files for children where there are concerns, with an overview chronology and a record of all communications and actions.

KEY CONTACT NUMBERS

Harrow Children's Social Care & Multi-agency Safeguarding Hub (MASH)	**Golden Number**: 020 8901 2690 **Emergency Duty Team**: 020 8424 0999 Weekends, bank holidays and between 5pm-9am during the week **Gavin Baker: 07927 548070 (Education lead)**
Police	**101** or for immediate emergency: **999**
FGM - Mandatory reporting	Police on **101**
Local Authority Designated Officer for Allegations against staff (LADO)	Initial referrals via MASH/Golden Number above.
Children and Young People with Disabilities 0-25 years (Harrow Council at Alexandra Health Clinic)	020 8966 6481
Local multi-agency procedures (& links to Pan London procedures), guidance and	www.harrowlscb.co.uk

Training: Harrow Safeguarding Children Board	
NSPCC	0800 800 5000
Childline	0800 1111
Government's Whistle-blowing Service via NSPCC Report Line	0800 028 0285

Child abuse can also be reported directly to the local council: *https://www.gov.uk/report-child-abuse-to-local-council*

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret. Remind them they trusted you enough to tell you so they must trust you to make the right choice at this point.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL (complete the form appendix 3). Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so
- Staff should not disclose information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Staff should be aware that children may not feel ready or know how to talk about abuse, not recognise their experiences as harmful, or feel embarrassed, humiliated or threatened but that this should not stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child

7.3 If you discover that FGM has taken place or a child is at risk of FGM

7.3.1 Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk, are set out in appendix 5.

7.3.2 **Any teacher** who either is informed by a girl under 18 that an act of FGM has been carried out on her or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must **immediately report this to the police, personally.** This is a **mandatory statutory duty**, and teachers will face **disciplinary sanctions for failing to meet it.** Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

The duty for teachers mentioned above ***does not apply in cases where a child is at risk of FGM*** or ***FGM is suspected but is not known to have been carried out***. Staff should not examine children.

7.3.3 **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **child under 18** should speak to the DSL and follow our local safeguarding procedures.

Any member of staff who **suspects** a child is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

7.3.4 Information on when and how to make a report can be found at https://www.gov.uk/female-genital-mutilation-help-advice.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

If you have concerns about a child's welfare, where possible, speak to the DSL first to agree a course of action. If in the exceptional circumstances that the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Safeguarding Team or take advice from local authority children's social care via the Golder Number (020 8901 2690).

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible. The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

7.4.1 Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the academy will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Each academy will also have their own Early Help offer available for families which will generally be led by the Family Focus Coordinator. More details can be found on each academy's website.

7.4.2 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures (found here: https://www.harrowscb.co.uk/london-gp/challenge-and-escalation/) to ensure their concerns have been addressed and that the child's situation improves.

Referrals to the local children's services team within Harrow are done via a MASH form which can be found here: https://www.harrowscb.co.uk/report-a-concern/general-referral-form-for-practitioners/ and can also be run via SIMS. Referrals are submitted via secure email to duty&assess@harrow.gov.uk

The MASH (Multi Agency Safeguarding Hub) Referral Form is for all practitioners (e.g. health, education, early support, housing, private and voluntary sector) who need to raise a request or a concern about a

Harrow child in need or a child likely to or currently suffering significant harm. The MASH will review the information on the referral form and where necessary contact the referrer to ascertain further information. The MASH will confirm receipt of the referral and then provide feedback on the decision about the referral. It is important that as much information as possible is provided in the first instance on the form and that a copy is stored securely for future reference by the academy. Any child protection leads within the organisation making the referral should be made aware of the referral before it is sent to the MASH; however, sending the form should not be delayed if the child protection lead is not available.

If the child is in immediate danger call the Police, 999. Complete and send the MASH referral form after the child's immediate safety has been addressed. The Police in these circumstances will also notify the MASH; but your information about the child will be vital in regards to further work.

Children with addresses outside The London Borough of Harrow should be referred to the local authority team in the area in which they live.

Brent: https://www.brent.gov.uk/services-for-residents/children-and-family-support/keeping-children-safe/contact-our-protection-team/

Hillingdon: https://www.hillingdon.gov.uk/article/7936/Concerned-about-a-childs-safety

Ealing: https://www.ealing.gov.uk/info/201183/information_for_professionals/1301/ealing_childrens_integrated_response_service/1

Hertfordshire: https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/report-child-protection-concern.aspx

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, speak to a member of the Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, **020 7340 7264**, which academy staff and Trustees and LSG Associates can call to raise concerns about extremism with respect to a child. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioral signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

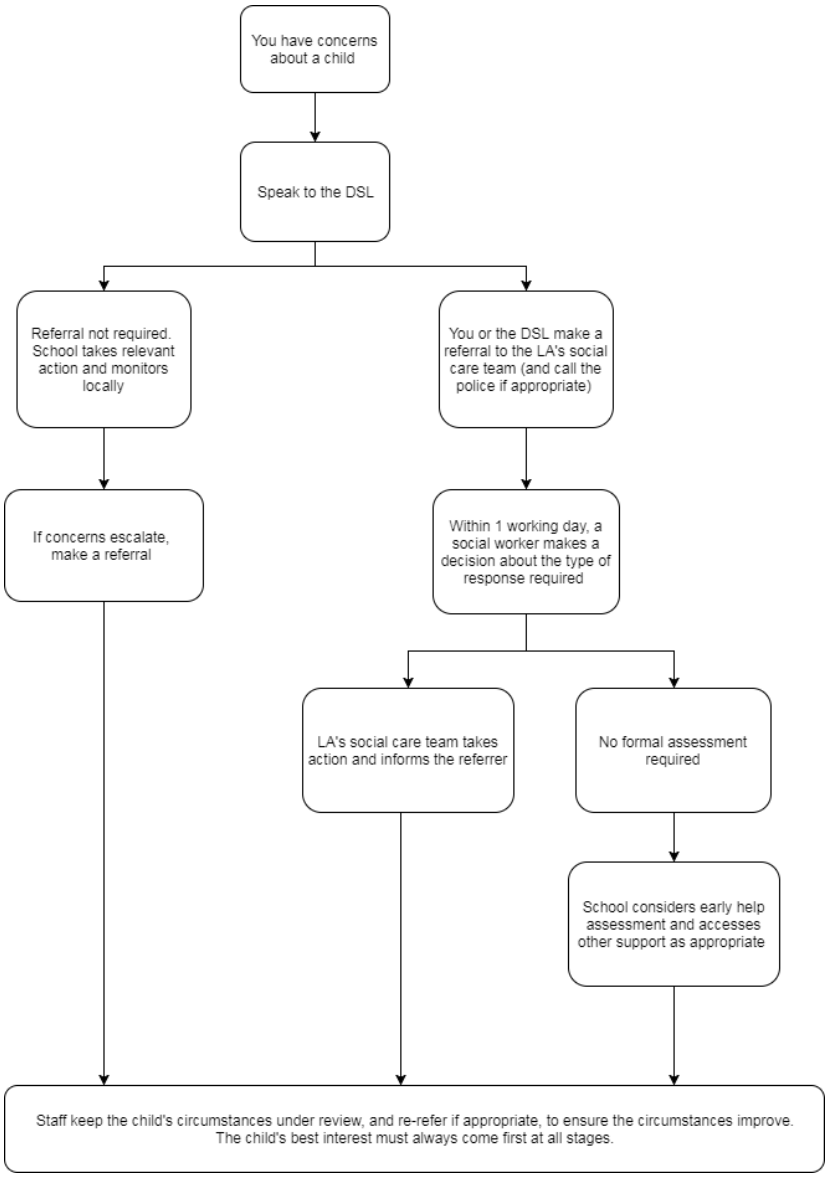
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

If you are worried about a child's mental health you can speak to the Schools Counselling Partnership Manager in your academy and/or the DSL/Deputies.

More information regarding mental health can behaviour can be found here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf/

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



7.8 Concerns about a staff member or volunteer (refer to page 3 and 4 for contact details)

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Academy Lead as soon as possible. If the concerns/allegations are about the Academy Lead, speak to the CEO. If the concerns/allegations are about the CEO, email Chair of Trustees who will then follow the procedures set out in appendix 5, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the CEO/ Academy Lead, report it directly to the local authority designated officer (LADO).

Where appropriate, the academy will inform OFSTED of the allegation and actions taken, within the necessary timescale (see appendix 5 for more detail).

The school will consider public transport as a potentially vulnerable place for a victim or alleged perpetrator(s).

The DSL will work closely with the police if there are delays in the criminal process.

The school will be alert to reports of sexual violence and/or harassment that may point to environmental/systematic problems or reflect wider issues.

If the school receives an allegation relating to an incident where an individual or organisation is using the school premises for running an activity for children, the school's safeguarding policies and procedures will be followed. The local authority designated officer (LADO) will be informed as with any safeguarding allegation

7.9 Allegations of abuse made against other children

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable, never tolerated and will be taken seriously.

Most cases of children hurting other children will be dealt with under the academy's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put children in the academy at risk
- Is violent
- Involves children being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 6 for more information about child-on-child abuse.

If a child makes an allegation of abuse against another child:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS, F-CAMHS), if appropriate

The school will support children who have witnessed sexual violence and that it will do all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate children about appropriate behaviour and consent
- Ensure children know they can talk to staff confidentially by talking to their 5 Trusted Adults*, use the counselling service if required and get support from any member of staff within the academy
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a child harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns

**5 Trusted Adults refers to children being able to name 5 adults in their academy and in their home/community, they can talk to regarding concerns, worries or questions they have linked to their safety and safeguarding*

Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly.

This is a matter for the school and should be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) should take a leading role.

The school should consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

7.10 The sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a child to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the child to delete it
- Ask the child(ren) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the child(ren) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the child(ren) that they will receive support and help from the DSL.

7.10.1 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate Academy staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to child(ren)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the children involved which would influence risk assessment

- If there is a need to contact another academy, school, college, setting or individual
- Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

7.10.2 The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes or semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Academy Lead and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

7.10.3 Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the children involved (if appropriate).

If at any point in the process there is a concern that a child has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

7.10.4 Informing parents

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the child at risk of harm.

7.10.5 Referring to the police

If it is necessary to refer an incident to the police, this will be done by dialling 101 and reporting the incident.

7.10.6 Recording incidents

All incidents of sharing of nudes or semi-nudes, and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of these incidents.

7.10.7 Curriculum Coverage

Children are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our [relationships education / relationships and sex education] and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- Issues of legality
- The risk of damage to people's feelings and reputation
- Children also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with children so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.11. Reporting systems for children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.

A victim reporting any form of abuse or neglect should never be given the impression that they are creating a problem by doing so.

To achieve this, we will:

- Put systems in place for children to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

8.0 Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis).

The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk.

The school will meet the victim's parent or carers with the victim present to discuss what arrangement are being put in place to safeguard the victim. The school will meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.

9.0 Children with special educational needs and disabilities

9.1 We recognise that children with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children being more prone to peer group isolation than other children
- The potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

9.2 We offer extra pastoral support for children with SEN and disabilities. This includes:

- Counselling service
- Learning mentor and social skills support
- 5 trusted adults to communicate with
- Abuse involving children with SEND will require close liaison with the DSL (or deputy) and the SENCO

10.0 Online safety and the use of mobile technology

10.1 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our Trust aims to:

- Have robust processes in place to ensure the online safety of children, staff, volunteers and those in governance
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

10.2 The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

10.3 To meet our aims and address the risks above we will:

- Educate children about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring children are encouraged to do so, including where they are a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings and other meetings.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when children are not present
    - Staff will not take pictures or recordings of children on their personal phones or cameras
- Make all children, parents/carers, staff, volunteers and those in governance aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a child is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, children and parents/carers are aware that staff have the power to search children' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Have appropriate filtering and monitoring on school devices and school networks
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy

10.4 We will follow the General Data Protection Regulation and Data Protection Act when taking and storing photos and recordings for use in the Academy.

10.5 Further information about the use of mobile phones and cameras can be found in our GDPR, Mobile Phone & e-safety policies.

11.0 Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behavior and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12.0. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Aliya Boghani (PPS) & Louise Bloomfield (TWPA), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13.0 Children who are lesbian, gay, bisexual or gender questioning

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning child, we will take a cautious approach as there are still unknowns around the impact of social transition, and a child may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the child). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where children can speak out or share their concerns with members of staff.

14.0 Complaints and concerns about Academy safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Other complaints

Please refer to the complaints policy regarding further information on the process.

14.3 Whistle-blowing

Children cannot be expected to raise concerns in an environment where staff members fail to do so.

All staff members are made aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they will speak with the Academy Lead or CEO, the Chair of Trustees, the designated lead for safeguarding and child protection or with the Local Authority Designated Officer (LADO).

A clear reporting procedure is in place for children, parents and other people to report concerns or complaints, including abusive or poor practice.

For more detail see our *Whistle Blowing Policy*.

15.0 Record-keeping

15.1 We will hold records in line with our records retention schedule.

15.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child. Online records will be kept securely via CPOMS. Where staff have made notes on paper these will be held in files kept by the DSL.

15.3 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

15.4 Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the academy.

15.5 If a child for whom the academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main child file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

15.6 Further information about the safeguarding record-keeping arrangements can be found in our *GDPR policy*.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15.7 Any concerns raised against staff member will be recorded and logged by the Academy Lead and CEO with effect from 1st September 2021 in line with new KCSIE guidance.

15.8 Where children leave the school, the DSL should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child arrives. The DSL should ensure secure transit, and confirmation of receipt should be obtained.

16.0 Training

16.1 All staff

16.1.1 All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all children

16.1.2 All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

16.1.3 Staff will also receive regular safeguarding and child protection updates, including on online safety, (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

16.1.4 Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

16.1.5 Volunteers will receive appropriate training.

16.1.6 Short term supply teachers or teaching assistants should undergo safeguarding training with their agency. Our academy admin staff will complete a short induction on safeguarding procedures at the academy including the naming of the DSL and showing them their photo. For long term supply teachers and teaching assistants, they will have access to academy safeguarding training eg from the DSL or via National College.

16.2 The DSL and Deputies

The DSL and deputies will undertake advanced child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Trustees & LSG Associates

All Trustees and LSG Associates receive appropriate safeguarding and child protection training, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

As the Chair of Trustees or LSG may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Academy Lead or CEO, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least one person conducting any interview for a post at the Academy will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

We keep a single central record which covers all staff (including supply staff and teacher trainees on salaried routes), volunteers, Trustees and LSG Associates and contractors. The Academy Lead and Chair of Trustees or LSG or nominated lead for safeguarding regularly monitor the single central record and complete a record of their scrutiny and recommendations.

16.5 Staff who have contact with children and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17.0 Monitoring arrangements

This policy will be reviewed **annually** by the Academy Lead and DSLs. At every review, it will be approved by the Board and implemented by the LSG.

18.0 Links with other policies

This policy links to the following policies and procedures:

- Low Level Concerns Policy

- Behaviour Policy
- Staff Code of Conduct Policy
- Complaints Policy
- Health and Safety Policy
- Attendance Policy
- E-safety Policy
- Equality Policy
- Relationships and Health Education Policy
- Medical Policy
- Mobile Phone Policy
- Curriculum Policies
- Privacy Notices
- GDPR Policy
- Whistle-blowing Policy
- Anti-bullying Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Safer Recruitment and DBS checks - policy and procedures

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, HR will carry out an online search on shortlisted candidates and shortlisted candidates will be informed that this will be done as part of the due diligence process and is clearly stated on every external advert. We will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter 'confirming that they have not imposed any sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach from the professional regulating authority in the country where the applicant has worked
  - Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in an academy/school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a Academy or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform - this should include an enhanced DBS check. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

If an agency provides the academy with an adult without a DBS check or there is a concern raised through their DBS, the academy will conduct a risk assessment on whether to accept them into the academy and any mitigations that are required.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the Academy has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the Academy.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we

will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

- All visitors will wear a badge and lanyard whilst on the Academy site

Trustees and LSG Associates

The Trustees and LSG Associates will have an enhanced DBS check without barred list.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, and those in governance will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities however as a Trust we commit to checking all in governance.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

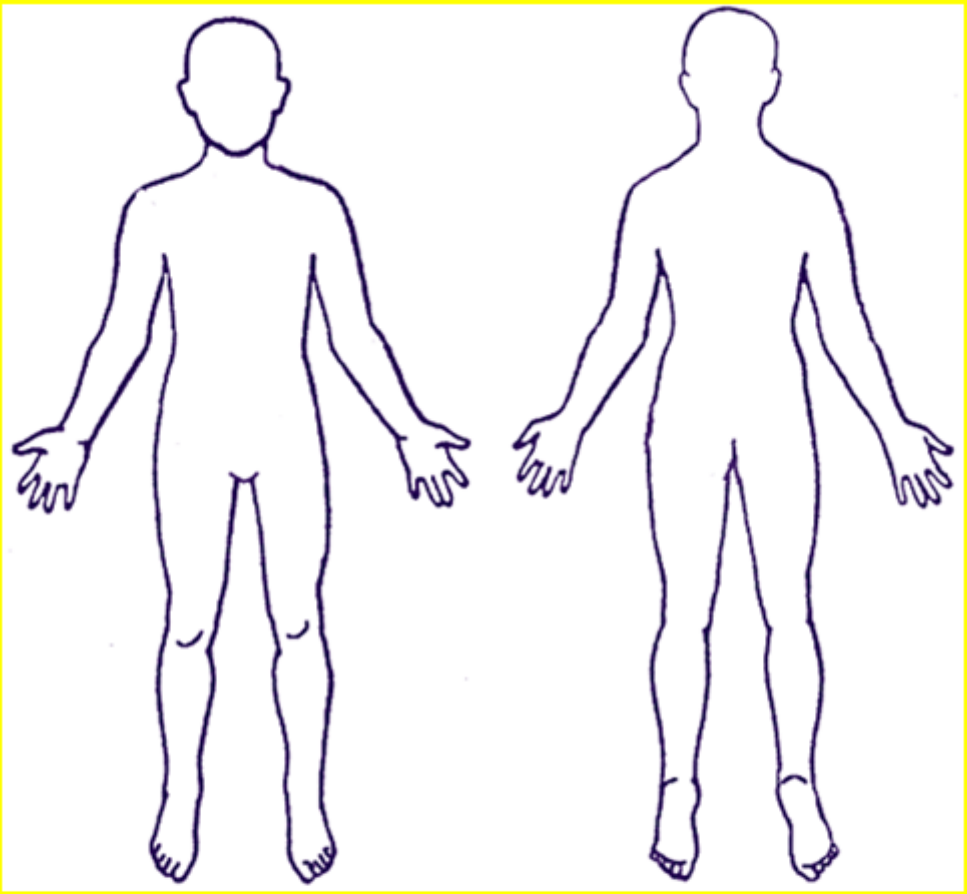
Appendix 3: Safeguarding Referral Form

Each Academy within the Trust will have a Safeguarding Referral Form. A Trust model form is available to all academies. This may include an online referral system. The school will **also** follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

Person filling in form:				
Name of child:				
Class/DOB:				
Date and time of concern:				
Observation/ discussion causing concern: (names,dates etc) Quote the child				
What was your specific response (quote) inc any actions, time and date:				
What was the outcome - how were things left with the child:				
Time & Date Shared with Schools DCPO:		Follow up by DCPO including dates and times:		
Feedback given to staff member:			Information to be shared wider? Why?	

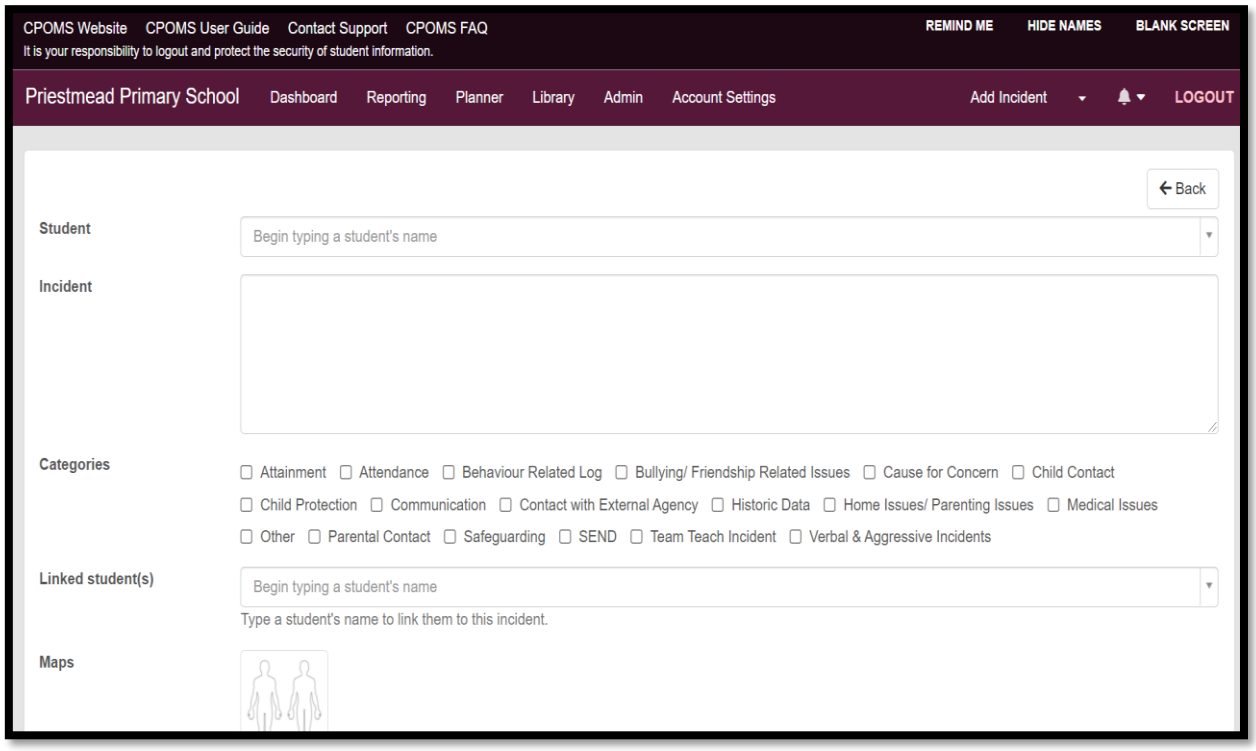
Please indicate any markings/ bruises causing concern:

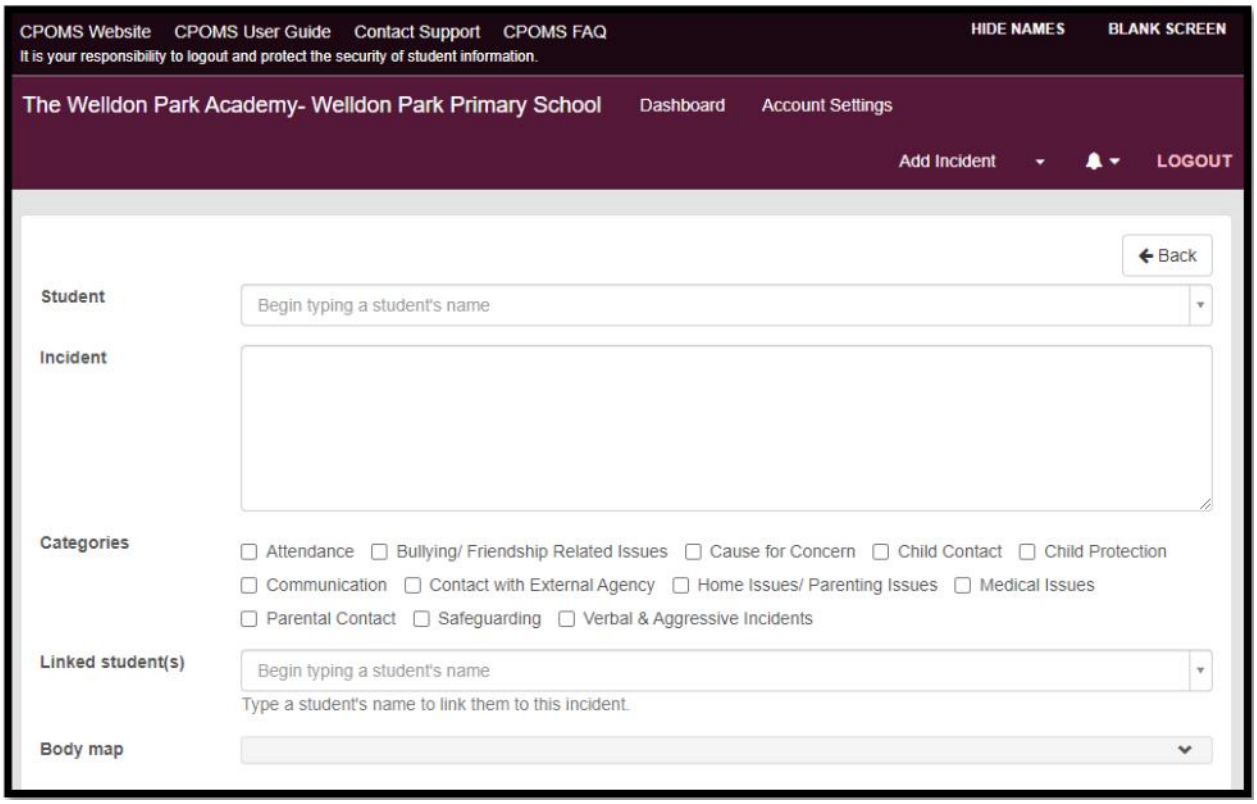
FRONT BACK



ANY OTHER DETAILS OF PHYSICAL MARKS:

Online systems:



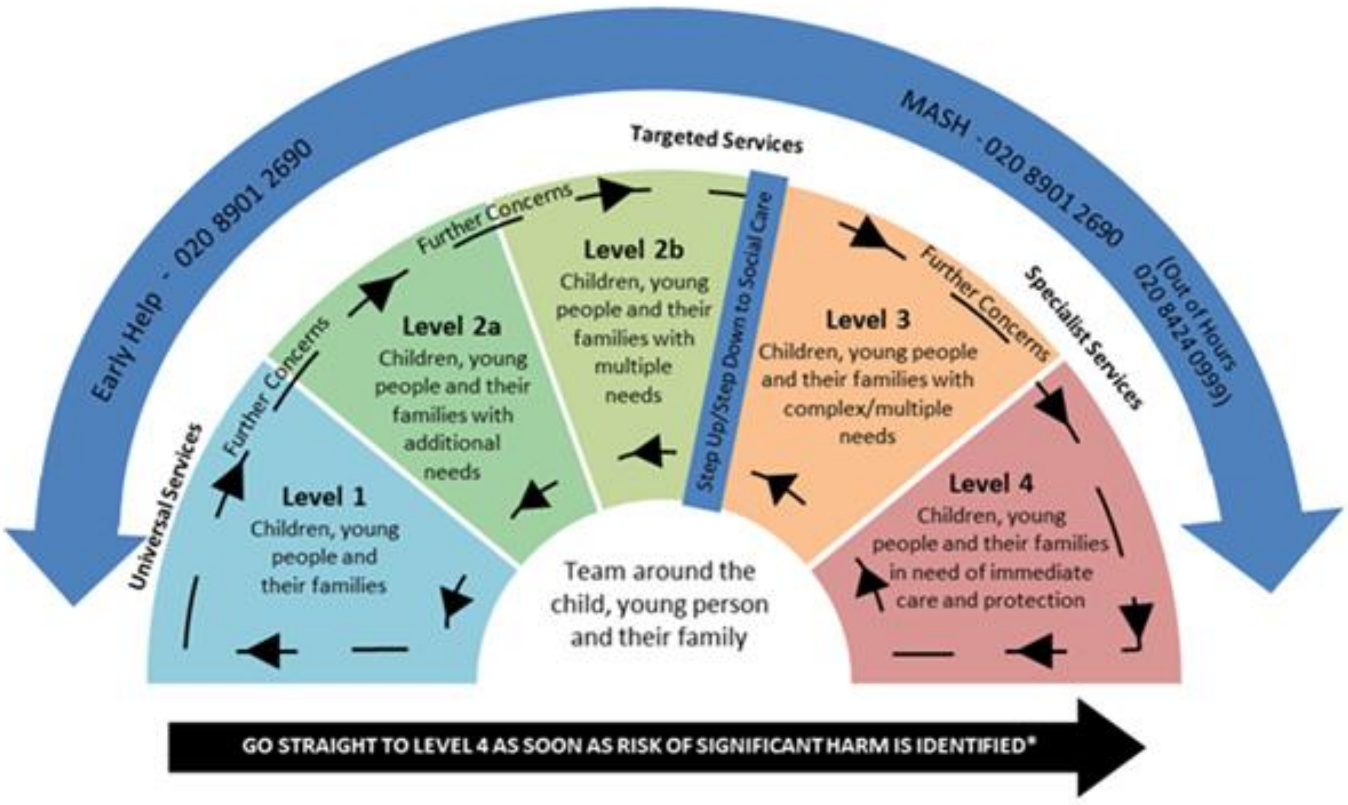


CHECKLIST FOR DSL:

- ✓ Child clearly identified
- ✓ Name, designation and signature of the person completing the record populated?
- ✓ Date and time of any incidents or when a concern was observed?
- ✓ Date and time of written record?
- ✓ Distinguish between fact, opinion and hearsay
- ✓ Concern described in sufficient detail, i.e. no further clarification necessary?
- ✓ Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
- ✓ Record free of jargon?
- ✓ Written in a professional manner without stereotyping or discrimination?
- ✓ The record includes an attached completed body map (if relevant) to show any visible injuries

Appendix 4: LSBC Multi-Agency Threshold Guidance

Harrow LSCB Multi-Agency Threshold Guidance



Appendix 5: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- **Behaved in a way that has harmed a child, or may have harmed a child, or**
- **Possibly committed a criminal offence against or related to a child, or**
- **Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children**

It applies regardless of whether the alleged abuse took place in the Academy. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

The local authority designated officer (LADO) should be consulted if in any doubt as to whether a concern meets the harm threshold.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the Trust so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the Trust so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative academy or other work for the local authority

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Academy Lead (or CEO where the Academy Lead is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Academy and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in Academy and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Support is available to individuals through their trade union representatives, or for medical and welfare counselling through the Academy Counselling service or external support agency for Academies
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the Academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Academy's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the Academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the Academy's HR Director will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Academy.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Academy Lead, or other appropriate person in the case of an allegation against the Academy Lead, will consider whether any disciplinary action is appropriate against the child(ren) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a child.

Confidentiality

The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the Academy will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

LADO Contact

All new referrals to LADO need to go through MASH – email: duty&assess@harrow.gov.uk

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating children

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- Staff should be able to share low level concerns confidentially

Responding to low-level concerns

If the concern is raised via a third party, the Academy Lead will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses
- To the DSL and work together in their process or procedure for confidentially sharing low-level concerns

The Academy Lead will use the information collected to categorise the type of behaviour and determine any further action, in line with the TPPT's staff code of conduct. The Academy Lead will be the ultimate decision-maker when it comes to low-level concerns, but that they may wish to collaborate with the DSL.

For more information please see Developing and implementing a low-level concerns policy: A guide for organisations which work with children

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.
Staff will consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 6: specific safeguarding issues

Children who are absent from education (previously children missing from education)

A child going absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become absent from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend the Academy
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going absent in future. This includes informing the local authority if a child leaves the Academy without a new Academy being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share

sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent

to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a child is at risk of FGM.

Indicators that FGM has already occurred include:

- A child confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/child already being known to social services in relation to other safeguarding issues
  A girl:
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from Academy, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a child may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
  A girl:
- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from Academy
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

So-called 'honour-based' violence (including FGM and forced marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the child about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the child to an education welfare officer, pastoral tutor, learning mentor, or Academy counsellor, as appropriate
-

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the-above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Academies have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our Academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our children to stay safe online at Academy and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children's behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a child is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a child, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Private Fostering

We recognise the importance of identifying children in Private Fostering arrangements so that their needs can be fully assessed by the local authority. Each Academy will confirm the status of every child's care arrangements on admission (or when a child's care arrangements change) and notify the local authority of any known or suspected Private Fostering arrangement. We will support any subsequent assessment and remain alert to any additional needs that children placed away from their immediate families might face.

Physical Intervention

Our Academy's policy on physical intervention and positive handling by staff is set out separately. It complies with the DfE's guidance on use of reasonable force. This policy states that staff may only use reasonable force, meaning no more force than is needed to prevent children from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Head teachers and other authorised trained staff can use such forces as is reasonable in the circumstances to conduct a search for the following prohibited items: knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, mobile phones or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

If the use of force is necessary, reasonable adjustments for disabled children and children with special educational needs will be made however, many steps will be taken to minimize the need for force as per our behaviour policy.

Any use of force or restraint should be recorded and signed by a witness. The parent/carer will be informed of the incident.

Children with Disabilities or Special Educational Needs

Our Trust is committed to ensure that children with disabilities or special educational needs have exactly the same human rights to be safe from abuse and neglect, to be protected from harm and achieve the same outcomes as non-disabled children. We recognise that disabled children do however require additional action because they can experience greater vulnerability as a result of negative attitudes and because they may have additional needs relating to physical, sensory, cognitive and/or communication impairments.

This understanding is incorporated into our staff training, so that we all remain vigilant to identifying the additional vulnerabilities for these children in our care.

Gangs and Youth Violence

Academies are increasingly recognised as places where early warning signs can be spotted that younger children may be at risk of getting involved in gangs or youth violence. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched. We recognise that even low levels of youth violence can have a disproportionate impact on a child or the wider Academy/community environment. We will therefore, support children in developing safeguarding skills to prevent involvement in risky behaviours, and where serious concerns arise, we will work collaboratively with our partner agencies to help prevent escalation of harm. For further information, refer to government guidance on advice to Academies on gangs and youth violence.

Trafficking

All Academies in the Trust will remain alert for children trafficked into the country who may be registered at our Academy for a term or longer, before being moved to another part of the UK or abroad.

We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from the Academy. For further government guidance refer to Safeguarding Children who may have been trafficked practice guidance. and abuse reporting.

Substance Abuse

a) Children: We recognise the clear role our Academy has to play in preventing drug misuse as part of our pastoral responsibilities. We will provide age appropriate information on drugs and alcohol and tackle problem behaviour, working with local partners to prevent drug or alcohol misuse. For further guidance refer to DfE and ACPO Drug Advice for Academies.

b) Parental Substance Misuse: Substance misuse (drugs or alcohol) may impact on parental capacity and can significantly exacerbate other concerns such as domestic violence or mental health issues. We will remain vigilant in identifying and supporting children and their families facing such issues, and work in collaboration with other agencies where necessary to prevent significant harm.

Mental Health

a) Children: Our Academy seeks to promote positive mental health in our children and to identify and address those with less severe problems at an early stage and build their resilience. We are also committed to identifying and supporting children with more severe needs and to help make appropriate referrals to specialist agencies such as Child and Adolescent Mental Health Services (CAMHS) where necessary. For further information, refer to government guidance on mental health

and behaviours to identify and support children whose behaviour suggests they have unmet mental health needs.

b) Parental Mental Health: We recognise that some parents with mental health issues may experience difficulties at times with their parenting responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children. For further guidance refer to Think Child; Think Parent; Think Family: a guide to parental mental health and child welfare

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge and lanyard.

Visitors to the Academy who are visiting for a professional purpose, such as educational psychologists and Academy improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that the appropriate level of DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the Academy any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using Academy facilities is not seeking to disseminate extremist views or radicalise children or staff.

Non-collection of children

Children who are not collected must be taken the Academy office. The office is notified and a record is made. The Academy office will continue to phone nominated adults who care for the child, until contact is made. If available, the child will be supervised in any after school provision, or if this is not available is supervised by staff and a member of SLT is notified. They will continue to attempt to make contact with parents/carers. If contact cannot be made, the DSL, deputy DSL or a member of SLT will telephone Harrow MASH for advice and follow their instructions accordingly.

Missing children

We apply strict measures to ensure the safety of children. This includes measures to secure the Academy perimeter and access into Academy buildings. There is regular registration and full monitoring of children throughout the Academy day. Whilst strict safeguarding measures are in place, Academy feels it is prudent to have emergency protocols in place. These would be implemented should the whereabouts of a child be unknown. All staff are fully aware of Academy's Missing Child protocol (see Appendix 7 for the recording proforma).

Sexism and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Sexual violence and sexual harassment can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff are made aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk

Staff will be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Remaining alert to the possible challenges of detecting signs that a child has experiences sexual violence, and show sensitivity to their needs.

Child-on-Child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place face-to-face, online and sometime simultaneously between the 2.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

Abuse in intimate personal relationships between children is sometimes known as 'teenage relationship abuse'.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

The school has a zero-tolerance approach to sexual violence and sexual harassment, and that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will reassure them that the law on child-on-child abuse is there to protect them, not criminalise them.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

When considering instances of harmful sexual behaviour between children, the school will consider their ages and stages of development. The school recognises that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious Violence

Staff will be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Staff will be made aware of the risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

APPENDIX 7

The Welldon Park Academy

MISSING CHILD

CHILD'S NAME:

photo

CHILD'S AGE:

Adult who reported & time/date:

School search completed by: Upstairs Downstairs Toilets Playground Field Kingsley/ Wyvanhoe Local Shops

Time contacted parent:

Has the parent:

- ☐ Contacted any other relatives?
- ☐ Contacted any other possible carers?
- ☐ Searched the home?

Has the school:

- ☐ Checked with the class teacher and the class?
- ☐ Checked with the year classes?
- ☐ Spoken to any additional staff eg small groups, music teachers etc?

Description of what the child was wearing:

Time last seen: _____

Any issues/context prior to disappearance:

FOLLOW UP:
Police informed? Dial 999 and/or 101
Headteacher informed?
Child found?
Evaluation:
Signed:

MISSING CHILD

CHILD'S NAME:

photo

CHILD'S AGE:

Adult who reported & time/date:

School search completed by: Upstairs Downstairs Toilets Playground Field Hartford Park Shops

Time contacted parent:

Has the parent:
- ☐ Contacted any other relatives?
- ☐ Contacted any other possible carers?
- ☐ Searched the home?

Has the school:
- ☐ Checked with the class teacher and the class?
- ☐ Checked with the year classes?
- ☐ Spoken to any additional staff eg small groups, music teachers etc?

Description of what the child was wearing:

Time last seen: _____

Any issues/context prior to disappearance:

FOLLOW UP:
Police informed? Dial 999 and/or 101
Headteacher informed?
Child found?
Evaluation:
Signed: